

6. Defendants contacted Plaintiff's counsel, Cassandra Miller, by telephone and requested an extension of time for Defendants to respond to the Complaint. Defendants requested a 14-day extension of time (up to and including January 25, 2016) to answer or otherwise plead. Plaintiff's counsel indicated by telephone on January 6, 2016 that she does not oppose this request for an extension of time.

7. This is the first request for an extension of time to answer or otherwise plead to the Complaint that Defendants have made in this action. This request is not intended to cause delay or undue annoyance, and no party will be prejudiced if this Motion is granted.

WHEREFORE, Defendants respectfully request that this Court enter an order granting them up to and including January 25, 2016, in which to answer or otherwise plead to Plaintiff's Complaint.

Dated: January 7, 2015

Respectfully submitted,

MIDLAND FUNDING, LLC
MIDLAND CREDIT MANAGEMENT, INC. and
ENCORE CAPITAL GROUP, INC.

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CERTIFICATE OF SERVICE

I hereby certify that on January 7, 2016, I electronically filed the foregoing Defendants' Unopposed Motion For Extension Of Time To Answer Or Otherwise Plead using the CM/ECF system which will send notification of such filing to all registered participants.

s/Heather L. Kramer

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